

# Exhibit C

Francis Moran  
May 14, 2020

1

1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF NEW YORK

3 Case No. 1:18-cv-06127 (CBA) (RML)

4  
5 - - - - - X

6 MONICA MORRISON,

7 Plaintiff and

8 Counterclaim Defendant,

9 v.

10 ROBERT LANGRICK,

11 Defendant and

12 Counterclaim Plaintiff.

13 - - - - - X

14 VOLUME I

Pages 1-178

15  
16 VIRTUAL VIDEOTAPED DEPOSITION OF

17 FRANCIS THOMAS MORAN

18 Thursday, May 14th, 2020

19 9:56 a.m. Eastern Standard Time

20  
21  
22  
23 -- Reporter: Kimberly A. Smith, CSR, CRR, CRC, RDR --

24 Realtime Systems Administrator

25 U.S. Legal Support

1 APPEARANCES:

2  
3 Henry R. Kaufman, P.C.

4 By: Henry Kaufman, Esq.

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9 for the Plaintiff and Counterclaim

10 Defendant;

11  
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13 By: Andrew C. Phillips, Esq.

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15 Alexandria, VA 22314

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17 andy@clarelocke.com

18 for the Defendant and Counterclaim

19 Plaintiff.

20  
21 Also Present: Monica Morrison

22 Robert Langrick

23 Shawn Capron, Videographer

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## I N D E X

WITNESS: Francis Thomas Moran

EXAMINATION Page

By Mr. Phillips 6

## AFTERNOON SESSION

By Mr. Kaufman 130

## EXHIBITS FOR IDENTIFICATION:

Defendant's Description Page

DX-1 Hanover Police Department file 19

DX-2 Plaintiff's complaint for declaratory  
judgment 32

DX-3 Counterclaim defendant's answer 40

1 details otherwise, I believe that's what happened.

2 Q. So I want to break that down just a little  
3 bit. So you referred to the fact that during an  
4 investigation, you can learn facts that dispel the  
5 credibility of the complainant?

6 A. Or can cloud the matter to the point where  
7 you don't feel with confidence that you have proof  
8 that would justify a prosecution.

9 Q. Were there facts that came to light in this  
10 investigation that affected the credibility of  
11 Ms. Morrison as a complainant?

12 A. I don't know if I'd say credibility. But I  
13 think you could -- it depends on how you approach it.  
14 I think there were facts that caused issues that  
15 could, in my opinion, make it hard to prove beyond a  
16 reasonable doubt that she was the victim of a sexual  
17 assault.

18 And, again, the most important thing is  
19 to prove that she's a victim of an assault and to  
20 prove that the person who victimized her was  
21 Mr. Langrick and then pursuit of charges and  
22 prosecution.

23 Q. Based on your review of the file, do you  
24 see any indication that Mr. Langrick was ever  
25 arrested for sexual assault?

1       A. I do not see any indication that he was  
2 arrested for sexual assault.

3       Q. At the time in 2005, what was the standard  
4 for obtaining an arrest warrant for a felony like  
5 sexual assault?

6       A. Probable cause.

7               MR. PHILLIPS: Give me just one moment  
8 here and I'm going to try to pull up DX-3.

9                       (Exhibit DX-3 was marked  
10 for identification.)

11               MR. PHILLIPS: So Defendant's Deposition  
12 Exhibit DX-3 should be available for all to download  
13 in the chat feature. I'm going to go ahead and  
14 share it on my screen so Frank can see it.

15       Q. Frank, can you see on your screen the  
16 document that we've marked as DX-3?

17       A. I do not see "DX-3" on it. It could be  
18 further down on the page.

19               Yes, I see that now.

20       Q. I'll represent to you that this is  
21 Ms. Morrison's answer to the counterclaims that  
22 Mr. Langrick filed in this case. Again, you're free  
23 to download and peruse the entire document, but I'm  
24 going to direct you specifically to Ms. Morrison's  
25 response to paragraph 11, which is on page 6 of this

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## C E R T I F I C A T E

I, Kimberly A. Smith, a Certified Shorthand Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Registered Diplomate Reporter, and Realtime Systems Administrator in and for the State of New Hampshire, do hereby certify that the foregoing is a true and accurate transcript of my stenographic notes of the deposition of FRANCIS THOMAS MORAN, who was first duly sworn, taken virtually on the date hereinbefore set forth.

I further certify that I am neither attorney or counsel for, nor related to or employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed in this case, nor am I financially interested in this action.

THE FOREGOING CERTIFICATION OF THIS TRANSCRIPT DOES NOT APPLY TO ANY REPRODUCTION OF THE SAME BY ANY MEANS UNLESS UNDER THE DIRECT CONTROL AND/OR DIRECTION OF THE CERTIFYING COURT REPORTER.

Signed this 27th day of May, 2020.



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KIMBERLY A. SMITH, CSR, CRR, CRC, RDR

1 ERRATA SHEET DISTRIBUTION INFORMATION

2 DEPONENT'S ERRATA & SIGNATURE INSTRUCTIONS

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5 ERRATA SHEET DISTRIBUTION INFORMATION

6 The original of the Errata Sheet has been  
7 delivered to Andrew C. Phillips, Esquire.

8 When the Errata Sheet has been completed by  
9 the deponent and signed, a copy thereof should be  
10 delivered to each party of record.  
11  
12  
13

14 INSTRUCTIONS TO DEPONENT

15 After reading this volume of your deposition,  
16 please indicate any corrections or changes to your  
17 testimony and the reasons therefor on the Errata  
18 Sheet supplied to you and sign it. DO NOT make  
19 marks or notations on the transcript volume itself.  
20 Add additional sheets if necessary. Please refer to  
21 the above instructions for Errata Sheet distribution  
22 information.  
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